

INTERVENTION



0000119601

BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION

JUN 7 3 32 PM 1999

DOCUMENT CONTROL

ORIGINAL

CARL J. KUNASEK

Chairman

JIM IRVIN

Commissioner

TONY WEST

Commissioner

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
APPROVAL OF ITS PLAN FOR STRANDED
COST RECOVERY.

) DOCKET NO. E-01345A-98-0473

) Arizona Corporation Commission

) DOCKETED

IN THE MATTER OF THE FILING OF ARIZONA
PUBLIC SERVICE COMPANY OF UNBUNDLED
TARIFFS PURSUANT TO A.A.C. R14-2-1602 et
seq.

) DOCKET NO. E-01345A-97-0773

) JUN 5 7 1999

DOCKETED BY

WV

IN THE MATTER OF COMPETITION IN THE
PROVISION OF ELECTRIC SERVICES
THROUGHOUT THE STATE OF ARIZONA.

) DOCKET NO. RE-00000C-94-0165

) TUCSON ELECTRIC POWER
) COMPANY'S MOTION FOR
) LEAVE TO INTERVENE

Pursuant to A.A.C. R14-3-105 of the Rules of Practice and Procedure of the Arizona Corporation Commission ("Commission"), and the Commission's Procedural Order dated May 25, 1999, Tucson Electric Power Company ("TEP") hereby applies for leave to intervene in the above-captioned docket for the following reasons:

1. TEP is a corporation duly organized and existing under the laws of the State of Arizona with its principal office and place of business in the City of Tucson, Arizona. It owns and operates facilities for the generation, purchase, transmission, distribution and sale of electricity to the City of Tucson, to the surrounding Pima County area and to Fort Huachuca in Cochise County. In addition, TEP owns interests in property in New Mexico in connection with the generation and transmission of electric power.

- 1 2. TEP is a participant in Docket No. RE-00000C-94-0165.
- 2 3. TEP may be directly and substantially affected by the issuance of any orders or
- 3 decisions in this proceeding because:
- 4 a. TEP is an Affected Utility under the Retail Electric Competition Rules pursuant to
- 5 A.A.C. R14-2-1601, *et seq.*; and
- 6 b. TEP and its affiliates are potential competitors of Arizona Public Service
- 7 Company pursuant to A.A.C. R14-2-1601, *et seq.*
- 8 4. TEP's intervention will not unduly broaden the issues of this proceeding as it does not
- 9 intend to actively participate in the proceeding.
- 10 5. The name, mailing address and telephone number of the person upon whom service of
- 11 all pleadings, motions and other documentation is to be made is:

12 Bradley S. Carroll
13 Counsel, Regulatory Affairs
14 Tucson Electric Power Company
15 Legal Department - DB203
16 220 West Sixth Street - P.O. Box 711
17 Tucson, Arizona 85702
18 520/884-3945
19 520/770-2000 (Fax)

20 RESPECTFULLY SUBMITTED this 7th day of June, 1999.

21 TUCSON ELECTRIC POWER COMPANY

22 By: 

23 Bradley S. Carroll
24 Counsel, Regulatory Affairs
25 Legal Department - DB203
26 220 West Sixth Street - P.O. Box 711
27 Tucson, Arizona 85702

28 Original and ten copies of the foregoing
29 filed this 7th day of June, 1999, with:

30 Docket Control
 ARIZONA CORPORATION COMMISSION
 1200 West Washington Street
 Phoenix, Arizona 85007

1 Copies of the foregoing delivered
2 this 7th day of June, 1999, to:

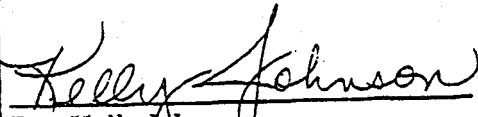
3 Jerry L. Rudibaugh, Chief Hearing Officer
4 ARIZONA CORPORATION COMMISSION
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7 Paul Bullis, Chief Counsel
8 Legal Division
9 ARIZONA CORPORATION COMMISSION
10 1200 West Washington Street
11 Phoenix, Arizona 85007

12 Ray Williamson, Acting Director
13 Utilities Division
14 ARIZONA CORPORATION COMMISSION
15 1200 West Washington Street
16 Phoenix, Arizona 85007

17 Copy of the foregoing mailed
18 this 7th day of June, 1999, to:

19 Steven Wheeler, Esq.
20 Thomas Mumaw, Esq.
21 SNELL & WILMER
22 One Arizona Center
23 400 East Van Buren
24 Phoenix, Arizona 85004

25
26
27
28
29
30
By: 
Secretary for Bradley S. Carroll